

Question 3 - Responses to 4.f.

In response to your question in reference to Question #3, Response #4f, HFF makes a considerable effort to achieve compliance with all applicable air quality standards in reference to your inquiry. The rotary dryer does incorporate additional control measures to control, reduce, and/or mitigate emissions from thermal processing of chicken litter and/or manure.

The additional measures include:

- Desired moisture content at 15 % - readings taken in the windrows a minimum of twice a week to determine when the product can be turned. HFF's goal is to start moving product at 20% to 25% to obtain the 15% ideal moisture content;
- A Camfil-Farr reverse-pulse-jet baghouse containing eight .5 microns filters with a 99.995% efficiency;
- A wet scrubber that utilizes a 3,000 gallon water tank which removes airborne dust particles by capturing them in liquid droplets. The droplets are collected, and sent to the cyclone;
- A cyclone that removes the dirt off of the conveyor belt and transports it into a collection bag, which is mixed with water from the wet scrubber to reduce emissions; and
- A company policy that no manure is processed below a 15% moisture content.

All additional measures listed above are designed to minimize any fugitive emissions that occur as a result of the rotary dryer operations, and to ensure that all required parameters as they relate to the Agriculture Best Management Practices Program, as well as our customers, are appropriately recorded and followed.

In addition, as stated before, HFF conducts monthly Hydrogen Sulfide and Ammonia testing procedures throughout our Arlington and Tonopah facilities. The testing frequency is performed as a proactive measure, rather than on the required schedule.

Lastly, HFF conducts monthly EPA Method 22 visible air quality checks on the rotary dryer system to ensure compliance as required.